## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

ENTERCOM BOSTON, LLC,

Plaintiff,

v.

C.A. No. 05-11410 NMG

TASTE-BOSTON & MAURA DOWNES,

Defendants.

## MOTION TO WITHDRAW AS COUNSEL

Now come Stephen P. Griffin and the law firm of Griffin Law LLC and move this Honorable Court, pursuant to L.R. 83.5.2 (c), for leave of court to withdraw as attorney for Defendants Maura Downes, individually and Maura Downes, d/b/a Taste-Boston (hereinafter "Downes"). As more fully described herein, Downes assents to the filing and allowance of this motion.

The procedural status of this case is as follows. An initial Case Management Conference is scheduled for January 4, 2006 at 3:00 p.m. Otherwise, there are no motions. hearings or other matters pending before the Court and no trial date has been set in this case.

In support of this motion, the undersigned state that despite repeated requests, Downes has been uncooperative with counsel in preparing responses to written discovery requests served by the Plaintiff, the deadline for which has passed. Further, it is the undersigned's understanding that Downes intends to contact the plaintiff in an attempt to resolve this matter directly and has instructed her counsel, in writing, to take no further action in this case. Downes has been notified of this motion and has given her assent to the undersigned's withdrawal as her attorney in this case.

As this case is in its initial stages, there is ample time for Downes to retain successor counsel should she so desire and no prejudice would result to the Plaintiff if this motion is allowed.

Respectfully submitted,

**GRIFFIN LAW LLC** 

/s/ Stephen P Griffin

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